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Attorneys for Petitioner Western Energy Alliance

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

WESTERN ENERGY ALLIANCE,)	
)	
Petitioner,)	
)	
v.)	Civil Case No. _____
)	
JOSEPH R. BIDEN, Jr., in his official)	
capacity as President of the United States,)	
SCOTT DE LA VEGA, in his official)	
capacity as Acting Secretary of the Interior,)	
and UNITED STATES BUREAU)	
OF LAND MANAGEMENT,)	
)	
Respondents.)	
_____)	

PETITION FOR REVIEW OF GOVERNMENT ACTION

Petitioner Western Energy Alliance submits respectfully this petition for review of government action under Local Civil Rule 83.6. On January 27, 2021, the Secretary of the Interior, acting at the President's direction, suspended indefinitely the federal oil and gas leasing program. The suspension is an unsupported and unnecessary action that is inconsistent with the Secretary's statutory obligations. Because the suspension is both arbitrary and capricious and

contrary to law, the Court should find the suspension invalid and set aside the challenged government action.

This Court has federal-question jurisdiction under 28 U.S.C. § 1331. Respondent President Biden is an officer of the United States; Respondent de la Vega is an officer of the United States; the Bureau of Land Management is an entity of the United States Government. The United States has waived its sovereign immunity under the APA, 5 U.S.C. § 702.

Submitted respectfully this 27th day of January, 2021,

/s/ L. Poe Leggette

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